Case 1:10-cv-04518-KBF Document 549 Filed 02/27/14 Page 1 of 2

Case 1:13-cv-09195-KBF Document 18 Filed 02/26/14 Page 1 of 2

New York Menlo Park Washington DC São Paulo London Paris Madrid Tokyo Beijing Hong Kong

Davis Polk

Karen E. Wagner

Davis Polk & Wardwell LLP 450 Lexington Avenue New York, NY 10017 212 450 4404 tel 212 701 5404 fax karen.wagner@davispolk.com

February 26, 2014

Re: Peterson v. Islamic Republic of Iran, Case No. 13 Civ. 9195 (KBF) [Rel. Case 10 Civ.

4518 (KBF)]

Via ECF and Electronic Mail

The Honorable Katherine B. Forrest United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: FFB 2 7 2014

Dear Judge Forrest:

We represent Clearstream Banking, S.A. ("Clearstream"), a defendant in the above-referenced action. We write in compliance with the Court's February 24, 2014 Order directing that any party objecting to unsealing the Complaint commencing this case shall notify the Court no later than February 26, 2014.

Clearstream does object to unsealing the Complaint, which contains information provided pursuant to and in reliance upon one or more protective orders. In addition, as Clearstream has advised the Court, Clearstream believes that the language of the Complaint could be misconstrued in certain respects, in a manner unintended by plaintiffs that could be harmful to Clearstream. We and counsel for Banca UBAE are discussing the matter with counsel for plaintiffs.

Clearstream therefore respectfully requests that the Complaint remain under seal until motions to dismiss have been resolved, or the Complaint amended. If the Court declines to maintain the sealed status of the Complaint, we respectfully request that the complaint be redacted before it is unsealed, and that the parties be given time to agree upon the redactions, a process which is underway.

Respectfully,

Karen E. Wagne

Case 1:13-cv-09195-KBF Document 18 Filed 02/26/14 Page 2 of 2

Liviu Vogel, Esq. 2 February 26, 2014

cc: All Counsel of Record (via ECF and Electronic Mail)

Ordered

The complaint shall remain

Scaled until further order

of the Court. The parties

should be aware, however, trak

the court's decision(s) or

motions to dismiss are very

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the complaint extusively and

will not be unly such.

2/27/14 WDJ